

Storm Water Management Plan

Permittee: Draper City

Permit Number: UTS000001

Location of MS4: Southeast Corner of Salt Lake County

Submitted with this permit is the following:

A map of the MS4 location

Information Regarding the overall quality concerns, priorities, and measurable goals specific to the Permittee that were considered in the development and/or revisions to the SWMP document

A description of the program elements that will be implemented in each of the six minimum control measures


A description of any modifications to ordinances or long-term/ongoing processes implemented in accordance with the previous MS4 general permit for each of the six minimum control measures

A description of how the Permittee intends to meet the requirements Permit as described in Part 4.0 by either referencing existing program areas that already meet the Permit requirements or a description and relevant measurable goals that include, as appropriate, the year by which the Permittee will achieve required actions, including interim milestones.

If applicable indication of joint submittal of Co-Permittees and the associated responsibility in meeting requirements of the SWMP

Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations"


Authorized Signature

10/23/23
Date

DELEGATION OF AUTHORITY

Utah Department of Environmental Quality
Division of Water Quality
195 North 1950 West
DEQ 3rd Floor
Salt Lake City, Utah 84116

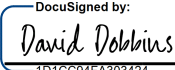
Dear Executive Director:

As the principal executive officer (or ranking elected official) of Draper City, I hereby authorize Robert Markle, acting as the Draper Deputy City Engineer/ Deputy City Public Works Director, to act on my behalf relative to documents, reports, notices or activities pertaining to our City's Small MS4 UPDES Storm Water Discharge Permit.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Respectfully Submitted,

Name: David Dobbins

Signature: 
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Title: City manager

Date: 10/23/2023 | 12:30 PM PDT



DRAPER CITY

STORM WATER

MANAGEMENT PLAN

**For Questions or comments about this management plan please contact
either of the following:**

**Draper City Deputy Public Works Director/ Deputy City Engineer
Robert Markle at 801-576-6360**

or

**Draper City Storm Water Specialist
Lucas Fowler at 385-529-2977**

INTRODUCTION

Polluted storm water runoff is often transported to municipal separate storm sewer systems (MS4s) and ultimately discharged into local rivers and streams without treatment. EPA's Storm Water Phase II Rule establishes an MS4 storm water management program that is intended to improve the Nation's waterways by reducing the quantity of pollutants that are introduced into storm sewer systems during storm events. Common pollutants include oil and grease from roadways, roadway salts and deicing materials, pesticides and fertilizers from lawns, sediment from construction sites, and carelessly discarded trash, such as cigarette butts, paper wrappers, and plastic bottles. When deposited into nearby waterways through MS4 discharges, these pollutants can impair the waterways, thereby discouraging use of the resource, contaminating water supplies, and interfering with the habitat for fish, other aquatic organisms, and wildlife.

In 1990, EPA promulgated rules establishing Phase I of the National Pollutant Discharge Elimination System (NPDES) storm water program. The Phase I program for MS4s requires operators of "medium" and "large" MS4s, that is, those that generally serve populations of 100,000 or greater, to implement a storm water management program as a means to control polluted discharges from these MS4s. The Storm Water Phase II Rule extends coverage of the NPDES storm water program to certain "small" MS4s but takes a slightly different approach to how the storm water management program is developed and implemented.

Storm Water Management Program

A Storm Water Management Program should:

- Reduce the discharge of pollutants to the "maximum extent practicable" (MEP);
- Protect water quality;
- Satisfy the appropriate water quality requirements of the Clean Water Act; and
- Be phased in over a five year period.

Storm water management programs must include:

- Best Management Practices (BMPs) for each of the six minimum control measures;
 1. Public Education and Outreach
 2. Public Participation/Involvement
 3. Illicit Discharge Detection and Elimination

4. Construction Site Runoff Control
5. Post-Construction Runoff Control
6. Pollution Prevention/Good Housekeeping

- Measurable goals for each minimum control measure (i.e., narrative or numeric standards used to gauge program effectiveness);
- Estimated months and years in which actions to implement each measure will be undertaken, including interim milestones and frequency; and
- The person or persons responsible for implementing or coordinating the storm water program.

Permit Application and Notice of Intent

Phase II Rule encourages the development of a storm water management program by requiring a Notice of Intent (NOI) describing the storm water management program to be submitted to the NPDES permitting authority. The Notice of Intent becomes the permit application.

Cities required to permit under Phase II are allowed to cooperate and work together with neighboring cities in the application process. The permittee may join with a Phase I city or another Phase II city in applying for a permit. The individual MS4s may share responsibility for program development with neighboring communities and/or take advantage of existing local or state programs.

Permit Requirements

The chosen measurable goals, submitted in the Notice of Intent as a permit application, become the required storm water management program; however, the NPDES permitting authority can require changes in the mix of chosen BMPs and measurable goals if all or some of them are found to be inconsistent with the provisions of the Phase II Final Rule. Likewise, the permittee can change its mix of BMPs if it determines that the program is not effective as it could be.

Reports

The permit requires that the city review the SWMP annually, report on our activities and make any updates that might be required. The annual reports should use the form provided by the State. Generally, the annual report should include the following information:

- The status of compliance with permit conditions, including an assessment of the appropriateness of the selected BMPs and progress toward achieving the selected measurable goals for each minimum measure;

- Results of any information collected and analyzed, including monitoring data if any;
- A summary of the storm water activities planned for the next reporting cycle;
- A change in any identified BMP or measurable goals for any minimum measure; and
- Notice of relying on another governmental entity to satisfy some of the permit obligations (if applicable).

Record Keeping

Records required by the NPDES permitting authority must be kept for at least 5 years and made accessible to the public at reasonable times during regular business hours. Records need not be submitted to the NPDES permitting authority unless the Permittee is requested to do so.

Penalties

The NPDES permit that the operator of a regulated small MS4 is required to obtain is federally enforceable, thus subjecting the Permittee to potential enforcement actions and penalties by the NPDES permitting authority if the permittee does not fully comply with application or permit requirements. This federal enforceability also includes the right for interested parties to sue under citizen suit provision (section 405) of CWA.

This document contains a description of the community-specific Storm Water Management Program for Sample City. The Program includes the following;

- Best Management Practices (BMPs) for each of the six minimum control measures;
 1. Public Education and Outreach
 2. Public Participation/Involvement
 3. Illicit Discharge Detection and Elimination
 4. Construction Site Runoff Control
 5. Post-Construction Runoff Control
 6. Pollution Prevention/Good Housekeeping
- Measurable goals for each minimum control measure (i.e., narrative or numeric standards used to gauge program effectiveness);

- Estimated months and years in which actions to implement each measure will be undertaken, including interim milestones and frequency; and
- The person or persons responsible for implementing or coordinating the storm water program.

This document also contains the following information and documentation in its appendices:

- Appendix A – Supplemental Guide to Storm Water Management for Contractors and Developers
- Appendix B – Supplemental Guide to Storm Water Management for Public Works Departments
- Appendix C – Standard Operating Procedures, Documentation and Elements of the Illicit Discharge Detection and Elimination program
- Appendix D – General program documentation including inspection forms, enforcement logs, training logs, annual reports, maintenance records, observation reports, and other general documentation
- Appendix E – Copies of the most current city ordinances applicable to stormwater
- Appendix F – Copies of State permits and documents regulating the Sample City storm water program
- Appendix G – System maps and inventories

DRAPER CITY CHARACTERISTICS

General Information

The Draper City Storm Drain System falls under the Public Works Department for the City. The Public Works Director can be contacted at the following address and phone number:

Draper City Hall
1020 East Pioneer Road
Draper, Utah 84020
(801) 576-6547

Some general information for Draper City follows:

Population: 51,749

Size: 30.3 square miles

Geographic Description: Located in the southeast corner of the Salt lake Valley, set against the Wasatch Mountain Range

Receiving Waters: Jordan River

Annual Precipitation: 15.69 inch

Steering Committee

A steering committee was formed in 2011, which includes a Storm Water Specialist.

Ongoing Documentation Process

With this revised SWMP our program has been restructured. The SWMP itself has been reorganized to make it more of a working document with multiple appendices to help the City do a better job in record keeping and documenting our activities. Much of the documentation is or will be included in Appendix D. As part of this update, the Steering Committee has reviewed existing BMPs and measurable goals and assessed them for their effectiveness and contribution in helping us achieve our desired results. We have completed evaluation worksheets to document our review and our assessment of our current program. These evaluation sheets are found in Appendix D. This evaluation provided the foundation for this update. We have tried to build off of the positive things that have been accomplished and renewed our commitment to improve in areas where our program has been lacking. We feel the revised program is more focused.

Our plan is to document our activities and to keep better track of what is happening within our community. This updated SWMP includes many new forms and reports to help us in these documentation efforts. Report forms, logs, evaluation forms and backup information is spread throughout the applicable appendices.

PUBLIC EDUCATION AND OUTREACH

Permit Requirements

The permit requirements for Public Education and Outreach on Storm Water Impacts can be found in Section 4.2.1 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements.

1. The MS4 must promote behavior change by the public to reduce water quality impacts associated with pollutants in storm water runoff and illicit discharges. This is a multimedia approach targeted to specific audiences. The four audiences are: (1) residents, (2) businesses, institutions, and commercial facilities, (3) developers and contractors (construction), and (4) MS4 industrial facilities.
2. Target pollutants and pollutant sources and their potential impacts relating to storm water quality.
3. Provide and document information given to the four focus audiences.
4. Provide documentation or rationale as to why particular BMPs were chosen for its public education and outreach program.

Summary of Existing Efforts

Educational Materials

The city plans to publish a newsletter annually

City used Media

Draper City has a website that is located at www.draperutah.gov

Message Board

The city currently owns and maintains a message board in City Hall. The purpose of the board is to post announcements and items of general interest to the community.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP, Draper City has chosen to adopt the following BMPs. Each BMP is cross referenced alphabetically by code in the indicated appendix to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness. Only those BMPs listed below will be utilized by Draper City as part of their SWMP at the present time.

BMP	Code	Appendix
Classroom Education On Storm Water	CESW	B
Educational Materials	EM	B
Employee Training	ET	B
Public Education/ Participation	PEP	B
Using Media	UM	B

Goals

In order to more fully realize the benefit of the BMP the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Education and Outreach.

The following table includes the goals for MCM 1.

Measurable Goal	Implementation Date	4a. Has the goal been achieved?	4b. If not, why?	4c. Revisions to further implement control measure.	4d. Action items for obtaining goals.
1A	Approx. 2011-Present	YES	n/a	No revisions	None
1B	Virtual Water Fair (Salt Lake County Coalition Water Fair)	YES	n/a	No revisions	None
1D	04/16/2023 (ongoing)	YES	n/a	No Revisions	Continue putting in storm water quality information in the newsletter, contact information on the back of billing, and announcements in the newsletter. The Draper City Storm Water webpage has been updated to let citizens know of hotline to call to report illegal dumping/illicit discharges. Citizens can now also submit a report directly from the website. There are also flyers posted on the bulletin board

					at Draper city hall letting them know about website as well as flyers to remind residents to clean up after their pets and keep them on leashes in watershed areas.
1E	03/24/2023	YES	Website is continually updated, ongoing coordination with SLC Health Department is ongoing	No revisions	Coordination With Health Department is ongoing
1F	07-15-2021	Yes	Annual training is distributed through HR	No Revisions	Implemented Annually
1G	10/17/2023	No	Need to conduct employee training	No Revisions	Finish Training employees about LID
1H	04/16/2015	Yes	n/a	No Revisions	new ordinance is adopted and maintenance agreement is approved.
1I	10/17/2023	Partially	Evaluation Methods have been chosen, but review among MS4 staff and storm water specialist is still needed.	No Revisions	Need to have a meeting and start a conversation with appropriate staff about any other BMPs that we will need to add or remove. All BMPs a have currently

					evaluated and some may change for the 2024 SWMP.
1J	06/12/2015	No	Documentation has been recorded about why we have chosen our current methods.	No revisions	BMPs have been evaluated and rational provided.

PUBLIC PARTICIPATION / INVOLVEMENT

Permit Requirements

The permit requirements for Public Participation and Involvement on Storm Water Impacts can be found in Section 4.2.2 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements.

1. Comply with applicable State, and local public notice requirements to involve interest groups and stakeholders for their input on the SWMP.
2. Make available to the public a current version of the SWMP document for review and input for the life of the permit. This should be posted on the City's website.

Summary of Existing Efforts

Steering Committee

A "Storm Water Steering Committee" consisting of city members was formed in 2011 and has taken an active role in selecting the BMPs and developing the initial SWMP for the city.

Storm Drain Labeling Program

The city has begun a storm water stenciling program utilizing volunteer groups to place the stencils. To date approximately 1/10 of the community has been labeled.

Household Hazardous Waste Collection

Once a year the city provides a location for residents to bring household hazardous waste to a location for collection and proper disposal.

Service Groups

There are local scout and church groups that have participated in street cleanup and litter reduction.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Draper City has chosen to adopt the following BMPs for use within our city as applicable. Each BMP is cross referenced alphabetically by code to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness in the indicated appendix.

BMP	Code	Appendix
Public Education/ Participation	PEP	B

Goals

In order to more fully realize the benefit of the BMP the city has set the following

goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Public Involvement and Participation.

The following table summarizes the goals for MCM 2.

Measurable Goal	Implementation Date	4a. Has the goal been achieved?	4b. If not, why?	4c. Revisions to further implement control measure.	4d. Action items for obtaining goals.
2A	Ongoing	Yes	n/a	No revisions	n/a
2B	Ongoing	Yes	n/a	No Revisions	n/a
2C	Ongoing	Yes	n/a	No Revision	n/a
2D	Annually	Yes	n/a	No Revisions	n/a
2E	Ongoing	Yes	n/a	No Revisions	Keep posting stormwater information in the bi-monthly newsletters. Keep posting items to the city councils agenda for public to review.

ILLICIT DISCHARGE DETECTION AND ELIMINATION

Permit Requirements

The permit requirements for Illicit Discharge Detection and Elimination on Storm Water Impacts can be found in Section 4.2.3 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements.

1. Maintain a storm sewer system map of the MS4, showing the location of all outfalls and the names and location of all State waters that receive discharges from those outfalls.
2. Through an ordinance, or other regulatory mechanism, a prohibition (to the extent allowable under State, or local law) on non-storm water discharges into the MS4, and appropriate enforcement procedures and actions.
3. Develop and implement a plan to detect and address non-storm water discharges, including spills, illicit connections, and illegal dumping to the MS4.
4. Develop and implement standard operating procedures (SOPs) for:
 - a. tracing the source of an illicit discharge.
 - b. characterizing the nature of, and the potential public or environmental threat posed by, any illicit discharges found or reported.
 - c. ceasing the illicit discharge, including notification of appropriate authorities, property owners, and technical assistance for removing the source and follow-up inspections.
5. Inform public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste.
6. Promote or provide services for the collection of household hazardous waste.
7. Publicly list and publicize a hotline or other local number for public reporting of spills and other illicit discharges.
8. Develop a written spill/dumping response procedure, and a flowchart for internal use, including various responsible agencies and their contacts.
9. Adopt and implement procedures for program evaluation and assessment.
10. Train employees, at a minimum, annually, and at hire on the IDDE program.

Summary of Existing Efforts

Ordinances

Draper City has an ordinance designed to specifically prohibit illicit discharges to the storm sewer system. It can be found in Chapter 16-2 Storm Water Utility of the Draper City Municipal Code.

Illicit Spills

Currently, reports of spills are handled by Draper City, the Fire Department, and County Health Department.

Illicit Connections

The City has not generally experienced problems with individuals or businesses illicitly connecting their sanitary waste water piping to storm drains. More-common types of illicit discharges include spills from accidents, concrete truck wash out water, residential yard waste and debris being washed into the gutters, and carpet cleaner waste. There are other industrial businesses in town that are regulated directly by the state. These businesses are a concern.

Mapping

The city has a fairly comprehensive, GIS based, storm drain map showing the storm drain system and its points of discharge. A copy of this map is included in Appendix B.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Draper City has chosen to adopt the following BMPs for use within our city as applicable. Each BMP is cross referenced alphabetically by code to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness in the indicated appendix.

BMP	Code	Appendix
Community Hotline	CH	B,C
Employee Training	ET	B,C
Hazardous Waste Management	HWM	B,C
Illegal Dumping Control	IDC	B,C
Identify Illicit Connections	IIC	B,C
Illegal Solids Dumping Controls	ISDC	B,C
Map Storm Water Drains	MSWD	B,C
Non-Storm Water Discharge to Drains	NSWD	B,C
Ordinance Development	OD	B,C
Public Education/ Participation	PEP	B,C
Used Oil Recycling	UOR	B,C

Goals

In order to more fully realize the benefit of the BMP the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Illicit Discharge Detection and Elimination.

The following table includes the goals for MCM 3.

Measurable Goal	Implementation Date	4a. Has the goal been achieved?	4b. If not, why?	4c. Revisions to further implement control measure.	4d. Action items for obtaining goals.
3A	Ongoing	Yes/ongoing	A new ordinance has been drafted and will be adopted pending municipal staff review.	No revisions necessary at this time.	Adopt proposed ordinance with new changes.
3B	Ongoing	Yes/ongoing	n/a	No revisions are necessary at this time	Coordinate with GIS specialist to keep the current GIS map maintained on a frequent base.
3C	Ongoing	Yes	n/a	No revisions needed at this time.	Continue to monitor outfalls and priority areas. Implement maintenance agreements and conduct inspections once every 5 years. Adopt proposed ordinance with changes.
3D	Ongoing	Partially	Need to adopt revised ordinance.	Milestone date will need to be pushed back to middle of September 2016	Adopt revised ordinance
3E	Ongoing. Kit was purchased prior to new storm water specialists hire date.	Yes	n/a	No revisions needed at this time	Priority areas and outfall inspections will need to continue in the future.

3F	Ongoing	Yes	n/a	No revisions needed at this time	100% of required personnel have not yet been trained. Training will need to be completed.
3G	Ongoing	Yes	n/a	No revisions needed at this time.	Continue to monitor outfalls
3H	Ongoing	Yes	n/a	No revisions needed at this time.	Continue to document IDDE investigation and coordinate with the health department.
3I	04/2015/ongoing	Yes	n/a	No revisions needed at this time	Continue updating the website and updating efforts for MCM 1. Continue posting stormwater information on the bi-monthly newsletter.
3J	Ongoing	Yes	n/a	No revisions needed at this time.	Continue posting HHW collection events, and updating information on the website.
3K	Ongoing	Yes	n/a	No revisions needed at this time.	HHW addresses and phone numbers have been shown on the website. Continue to refine existing forms and procedures and train applicable employees.

3L	Completed	Yes	n/a	No revisions needed at this time	Spreadsheet has been created. Draper is now in the process of utilizing this spreadsheet. Spreadsheet will need to be updated as incidents occur.
3M	Ongoing	Yes	n/a	No revisions needed at this time	Continue training employees on IDDE investigation. They should be trained on who to call and where to find forms.
3N	Ongoing	Yes	n/a	No revisions needed at this time.	The storm water specialist is the only one who will be trained on this database for the time being. Once an established system is set up others may be trained depending on qualifications. All IDDE investigation are documented and available upon request.

CONSTRUCTION SITE RUNOFF CONTROL

Permit Requirements

The permit requirements for Construction Site Runoff Control can be found in Section 4.2.4 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements.

1. Develop, implement and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction sites with land disturbance of greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development.
2. Develop and adopt an ordinance that requires the use of erosion and sediment control practices at construction sites that is equivalent to the UPDES Storm Water General Permit.
3. Develop a written enforcement strategy and implement the enforcement provisions of the ordinance.
4. Develop and implement standard operating procedures (SOPs) for pre-construction SWPPP review for construction sites:
5. Develop and implement SOP's for construction site inspection and enforcement of construction storm water pollution control measures.
6. Ensure proper training to staff whose duties relate to the construction storm water program with proper training records kept.
7. Implement procedures to maintain records of all projects disturbing one acre, including projects less than one acre that are a part of a larger common plan of development..

Summary of Existing Efforts

Ordinance

Draper City has an ordinances designed to specifically reduce pollutants in any storm water runoff from construction sites by requiring all projects to submit all information and install all sediment and erosion control measures prior to performing any land disturbance, on any project of any size. They can be found in Chapter 18 Land Disturbance and Chapter 16-2 Storm Water Utility of the Draper City Municipal Code.

Inspections, Enforcement and Records

The City has had in place for many years an inspection and enforcement system. The City also requires a Draper City NOI for any project less than one acre so smaller projects are tracked and inspected as well.

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Draper City has chosen to adopt the following BMPs for use within our city as applicable. Each BMP is cross referenced alphabetically by code to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness in the indicated appendix.

BMP	Code	Appendix
Ordinance Development	OD	B,C
Erosion Control Plan	ECP	B,C
Zoning	ZO	B,C
Land Use Planning/ Management	LIP	B,C
Contractor Certification and Inspector Training	CCIT	B,C

Goals

In order to more fully realize the benefit of the BMP the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Construction Site Runoff Control.

The following table includes the goals for MCM 4.

Measurable Goal	Implementation Date	3a. Has the goal been achieved?	3b. If not, why?	3c. Revisions to further implement control measure.	3d. Action items for obtaining goals.
4A	Ongoing	Yes	All sites are required to have a SWPPP before construction can begin. This pertains to sites over an acre or less than an acre within a common plan of development. If a site is less than 1 acre, then a SWPPP needs to be submitted with Draper City Land Disturbance Permit or Building Permit.	No revisions needed at this time.	Evaluate every project that comes through the city's review process and obtain a SWPPP and appropriate state and local permits. Most sites will require a SWPPP and the standards for that SWPPP are reflective of the permits that owners are required to obtain before construction begins.
4B	Complete	No	Stormwater Ordinance is currently in its final phase of review with updates to reflect state requirements. The ordinance will be submitted to city council on October 18, 2016.	No revisions needed at this time.	Adopt current stormwater ordinance.
4C	Ongoing	Yes	An Excel spreadsheet is used to document all municipal	No revisions are required at this time.	Continue to monitor all state and locally permitted

			SWPPP inspections. Spreadsheet shows when municipal inspections as well as any enforcement action that were used to obtain compliance.		construction sites and document inspection forms.
4D	Feb 2012	Yes	n/a	No revisions required at this time	The city currently uses the UPDES Stormwater Inspection Evaluation Form for SWPPP compliance for UPDES permitted sites.
4E	Ongoing	Yes	n/a	No revisions required at this time.	Pre-con meetings are always held and SWPPP is reviewed prior to and during meeting.
4F	March 2015	No	Draper is currently updating our ordinance to include post construction BMPs, LID and maintenance agreements.	No revisions required at this time.	Adopt ordinance and begin requiring maintenance agreements on all new developments. Train staff on new checklists, design requirements, and documents.
4G	February 2015	No	Draper is currently updating our ordinance to include LID,	No revisions required at this time.	Adopt ordinance and begin requiring LID on all new developments

			and post construction BMPs and maintenance.		that are over 1 Acre. Train staff on new checklists, design requirements, and documents.
4H	May 2015	Yes	A sensitive area map has been created. However priority construction sites have not yet been developed.	No revisions required at this time.	Continue to use Active construction spreadsheet as to which sites are high priority, and inspect twice a month.
4I	Ongoing	Yes	Staff have been doing SWPPP inspections for site permitted by the UPDES construction general permit and residential single lot permits	No revisions required at this time.	Continue maintaining spreadsheet/d atabase for active construction sites and train staff to complete SWPPP inspections as required by the new construction general permit and residential single lot permits
4J	Ongoing	Yes	All SWPPP inspectors are currently certified.	No revisions required at this time.	A new part-time stormwater compliance inspector position was created in the city to conduct most SWPPP inspection on UPDES permitted sites. The stormwater

					specialist is also conducting inspections. Both positions are required to maintain RSI certification
4K	Ongoing	Yes	n/a	No revisions at this time	UPDES permitted sites are tracked and NOT inspections are taking place to properly close down permits.
4L	2020	Yes	n/a	No revisions at this time	NOT process was added as a condition of C of O's and warranty releases
4M	Ongoing	Yes	A map with sensitive areas as been created in GIS. This map should be used to determine if a site is high priority. Other attributes such as slope and surrounding sensitive areas are also contributing factors for determining high priority sites.	No revisions at this time.	Continue to monitor and identify high priority sites and implement bi-weekly inspection schedule
4N	Ongoing	Yes	A log has been created and the storm water specialist has been tracking inspections.	No revisions at this time	Continue to utilize log and update consistently.

LONG-TERM STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Permit Requirements

The permit requirements for Long-Term Storm water Management in New Development and Redevelopment can be found in Section 4.2.5 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements.

1. Develop, implement and enforce a program to address post-construction storm water runoff to the MS4 from new development and redevelopment construction sites.
2. Develop and adopt an ordinance that requires long-term post-construction storm water controls at new development and redevelopment sites.
3. Develop an enforcement strategy and implement the enforcement provisions of the ordinance.
4. Post-construction program must have requirements to ensure that any storm water controls or management practices will prevent or minimize impacts to water quality:
 - encourage LID practices
 - include non-structural BMPs
 - retrofit existing developed sites that are adversely impacting water quality, retrofit plan should include:
 - proximity to waterbody
 - status of waterbody to improve impaired waterbodies and protect unimpaired waterbodies
 - Hydrologic condition of the receiving waterbody
 - proximity to sensitive ecosystem or protected area
 - any upcoming sites that could be further enhanced by retrofitting storm water controls
 - Define specific hydrologic methods for calculating runoff
5. Adopt and implement procedures for site plan review which incorporate consideration of water quality impacts.
6. Adopt and implement SOPs for site inspection and enforcement of post-construction storm water control measures. Procedures must ensure adequate ongoing long-term operation and maintenance of approved storm water control measures.
7. Provide all staff involved in post-construction program proper training.

8. Maintain an inventory of all post-construction structural storm water control measures installed and implemented at new development and redeveloped sites.

Summary of Existing Efforts

Draper City Drainage Design Criteria

The Draper City Drainage Design Criteria was adopted in October 2012 and includes specific criteria for use in the design of stormwater facilities. They are presented in two sections: Hydrologic Criteria and Design Criteria. Hydrologic Criteria includes precipitation, drainage design frequency, design storm distribution and duration, and the storm drainage modeling method. Design Criteria includes street drainage, storm inlets, storm drains, stormwater quantity control facilities, and easements.

A copy of the Draper City Design Criteria can be found on the Draper City website at:

<https://www.draperutah.gov/291/Design-Standards-Details>

Plan and Implementation Measures

In order to help meet the goals and objectives of this SWMP Draper City has chosen to adopt the following BMPs for use within our city as applicable. Each BMP is cross referenced alphabetically by code to a fact sheet that describes the BMP, its applicability, its limitations, and its effectiveness in the indicated appendix.

BMP	Code	Appendix
Ordinance Development	OD	B,C
Infrastructure Planning	IPL	B,C
Education Materials	EM	B,C
Land Use Planning/ Management	LIP	B,C
BMP Inspection and Maintenance	BMPIM	B,C

Goals

In order to more fully realize the benefit of the BMP the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Construction Site Runoff Control.

The following table includes the goals for MCM 5.

Measurable Goal	Implementation Date	3a. Has the goal been achieved?	3b. If not, why?	3c. Revisions to further implement control	3d. Action items for obtaining goals.
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				measure.	
5A	2017	Yes	n/a	No Revisions	Goal complete
5B	2016	Yes	n/a	No Revisions	Get ordinance approved by city council near the end of October 2016
5C	Unknown	No	Standards have not been adopted.	No Revisions	Continue to require pretreatment of discharge on privately owned sites. Select standards and include with other Draper city standards.
5D	Unknown	Unknown	No specific	No Revisions	Need to adopt standard for contractors/developers selecting, and technical basis for protecting water quality.
5E	Implemented the day that the Drainage Design Criteria 2012 was adopted to SDMP	Partially	Need to train planning, engineering staff to incorporate into review	No revisions	Implement Urban Storm Drainage Criteria Manual-Volume 3?" Into our capital improvement plan. Train planning department and engineering department on requirements.
5F	Implemented the day that the Drainage Design Criteria 2012 was	Yes	Current design standards give information on storm sizes/freque	No Revisions	Use defined hydrologic method or methods for calculating

	adopted to SDMP		ies to use.		runoff for sizing of post construction BMPs structures designed to treat storm water.
5G	Partially	No	No design standards have yet been selected. Currently in the process of training employees on LID so that all can have input about selecting standards. In our Drainage design manual we mention that we want designers to use the Urban Drainage Criteria Manual volume 3	No Revisions	Need to Adopt preferred design standards
5H	Ongoing	Yes	Stormwater Specialist currently reviews SWPPP plans.	No Revisions	The stormwater specialist currently used the DEQ checklist for sites requiring a UPDES Construction General Permit
5I	None	Partially	n/a	No Revisions	A GIS map has been created that shows the location of rivers/creeks, Protected watersheds, water bodies, waterways, ecological

					areas, Critical Watershed areas, springs, and federal lands.
5J	None	No	LID/BMPs to treat areas outlined in MCM 5I have been selected but not yet discussed with Draper City staff. More coordination will need to be done to determine which LID/BMPs will be most effective.	No Revisions	Select what type of methods we can give to developers/contractors to treat storm water at these environmentally sensitive areas. Currently developers are left with the ultimate decision as they are the owners of LID/BMPs that are installed.
5K	No	No	No log has yet been created.	No Revisions	Create a log of who and when we send Appendix A. We may need to coordinate with Development engineers about the best place to keep this. i.e. individual project folders. Perhaps our storm water webpage will suffice for this requirement?
5L	None	No	No log has yet been created	No revisions	A log has been created and in the MCM 5L folder. We will need to update

					<p>it. I have also added column in the active construction site log so that when we review somebody's SWPPP they can make sure to add it to the log. Additionally we will store a copy of the SWPPP checklist when it is signed and submitted to Draper City.</p>
5M	None	No	<p>SOPs for site inspection of post-construction storm water control measures has not yet been created. Forms for areas to check have been created, however.</p>	No Revisions	<p>Need to create and customize SOPs for inspection and enforcement of post construction control measures. Need to be current and utilized. It looks like form H-09 was set up as an inspection evaluation form and a good place to start. I have also emailed Nestor to see if he could provide any SOPs that we can copy and adopt as our own. Nestor has responded with</p>

					maintenance agreements and inspection forms that we will incorporate into an SOP.
5N	No	No	Maintenance Agreement Draft has been created to address private owner/operators inspection schedules	No Revisions	Adopt ordinance and use Salt Lake County's existing template as a baseline.
5O	None	No	Maintenance Agreement Draft has been created to address private owner/operators inspection schedules	No Revisions	Need to adopt template by October 2016
5P	Unknown	Unknown	Need a complete inventory of storm water controls	No revisions	Need to be completed by September October 2016
5Q	Unknown	Unknown	The list for MCM 5P it will need to list responsible parties who are in charge of inspection/maintenance of post-con BMP	No Revisions	Needs to be completed by October 2016
5R	None	No	Inspection report form has been created, but not yet adopted	No Revisions	Needs to be completed by October 2016
5S	Unknown	Unknown	Need to conduct annual inspections on municipally owned BMPs	No Revisions	Should currently be in progress with inspections taking place for City owned

					BMPs and detention basins.
5T	Unknown	Unknown	” “	No Revisions	Should be doing 20% of privately owned BMPs per year. This will be started once new ordinance is in place and maintenance agreements are signed.
5U	Unknown	Unknown	Training has not yet been done	No revisions	Need to schedule an annual training for MS4 Staff.
5V	Unknown	Unknown	Create inventory of post construction BMPs.	No Revisions	Need to create log and update.

POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Permit Requirements

The permit requirements for Pollution Prevention and Good Housekeeping for Municipal Operations can be found in Section 4.2.6 of the permit. A copy of the permit is included in Appendix F for reference. The permit outlines in general the following requirements.

1. Develop and implement an operations and maintenance program for Permittee-owned or operated facilities, operations and structural storm water controls that includes SOPs and a training component that have the goal of preventing pollutant runoff.
2. Shall develop and keep current a written inventory of Permittee-owned or operated facilities and storm water controls.
3. Must initially assess the written inventory of Permittee-owned or operated facilities, operations and storm water controls for their potential to discharge to storm water the following pollutants:
 - sediment
 - nutrients
 - metals
 - hydrocarbons
 - pesticides

- chlorides
 - trash
 - Ecoli
 - additional pollutants associated with permittee facilities
4. Identify "High Priority" facilities that have a high potential to generate storm water pollutants.
 5. Develop facility specific SOPs for each "high priority" facility which include BMPs and LID
 - SOP shall also include pollution prevention for all of the following:
 - Buildings and facilities
 - Material storage areas, heavy equipment storage areas and maintenance areas
 - Parks and open space
 - Vehicle and Equipment
 - Roads, highways, parking lots
 - Storm water collection and conveyance systems
 - Other facilities and operations
 6. If a third party conducts municipal maintenance or if private developments are allowed to conduct their own maintenance, the contractor shall be held to the same standards as the permittee.
 7. An O & M program for city owned facilities shall include the following inspections:
 - Monthly visual inspections of "high priority" facilities
 - Semi Annual Comprehensive Inspection of "High Priority" Facilities
 - Annual Observation Of Storm Water Discharge of "High Priority" Facilities
 8. Develop and implement a process to assess water quality impacts in the design of all new flood management structural controls.
 9. Adopt and implement SOPs for site inspection and enforcement of post-construction storm water control measures. Procedures must ensure adequate ongoing long-term operation and maintenance of approved storm water control measures.
 10. Public construction projects shall comply with the requirements applied to private projects.

11. Provide training to all employees who have primary construction, operation, or maintenance job functions likely to impact storm water quality

Summary of Existing Efforts

Draper City Operated Facilities

Draper City has completed an inventory of all owned and operated facilities, including identifying storm drain systems, floor drain systems and any potential sources of pollutant runoff. Visual observations and inspections are conducted in accordance with 4.2.6.6 of the permit.

Draper City Drainage Design Criteria

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Plan and Implementation Measures

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BMP	Code	Appendix
Housekeeping Processes	HP	B,C
Infrastructure Planning	IPL	B,C
Employee Training	ET	B,C

Goals

In order to more fully realize the benefit of the BMP the city has set the following goals. The goals set along with the existing efforts fulfill the requirements of the Final Storm Water Phase II Rule for Construction Site Runoff Control.

The following table includes the goals for MCM 6.

Measurable Goal	Implementation Date	3a. Has the goal been achieved?	3b. If not, why?	3c. Revisions to further implement control measure.	3d. Action items for obtaining goals.
6A	March 2014	Yes	n/a	Continuously update responsibilities for each department	Update organization chart
6B	Dec. 2012	Yes	n/a	Need to update list and verify of any new buildings	Update list.
6C	February 2012	Yes	n/z	Continue to add new sites. Such sites may include new PW facility, and Police storage garage near animal control.	Review/update list
6D	March 2014	Yes	n/a	No revisions at this time	Continue to review SOPs and revise as needed.
6E	Ongoing	Partially	Only detention basin inspections have been the focus of inspections. Storm Water department documents other types of maintenance on an as needed basis.	Create inspection reports for street sweeping, inlet maintenance, pipe maintenance and other infrastructure.	Continue to annually inspect detention basins. Incorporate other storm drain infrastructure in inspection schedule.
6F	Ongoing	Yes	Monthly inspections of high priority	No revisions needed at this time.	Weekly inspections

			facilities have been documented.		have again started and need to be completed every week. Continue to update logs and corrections made.
6G	July 2012	Yes	n/a	No revisions needed at this time	none
6H	Ongoing	Partially	Quarterly inspections are conducted and mirror our weekly inspections. Quarterly maintenance/housekeeping maps and memos are created and sent to department heads to address deficiencies.	No revisions needed at this time.	Quarterly inspections have again started and need to be completed every week.
6I	Ongoing	No	Quarterly inspections of visually observing storm water discharges have been completed.	No revisions needed at this time.	Continue to perform quarterly inspections and create quarterly maintenance/housekeeping tasks to keep facility in compliance.
6J	August 2012	Yes	n/a	No revisions needed at this time	Continue to perform quarterly storm water discharge inspections at high priority

					facility.
6K	Oct 2012	Partially	Flood management structural controls should have stormwater quality included. Detention basins allow for sedimentation and orificace plates headgates assist in basic containment of trash/litter	No revisions needed at this time	Incorporate LID or other stormwater quality into design of flood management controls.
6L	Ongoing	partially	Get a policy approved for all flood control structures to take into account storm water quality	No revisions needed at this time.	Create standards or update stormwater master plan.
6M	Ongoing	Partially	Existing flood management structural controls (detention basins) is now taking place. Deficiencies are identified and sent to Storm Water Department head for evaluation.	No revisions needed at this time.	Continue to monitor detention basins. Include in future inspections EWP project and other flood management controls.
6N	Ongoing	Partially	Train municipal staff in construction, operation, or maintenance to be aware of illicit discharges and	No revisions needed at this time.	Document training logs and complete annual stormwater training

			know what to do if they observe/cause an illicit discharge		
60	Ongoing	Partially	IDDE training has been the main focus	No Revisions needed at this time.	Conduct trainings.